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**UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re:

Genesis Global Holdco, LLC, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No.: 23-10063 (SHL)

Jointly Administered

**NOTICE OF FILING OF PLAN SUPPLEMENT  
FOR THE DEBTORS' AMENDED JOINT CHAPTER 11 PLAN**

**PLEASE TAKE NOTICE** that, on December 29, 2023, Genesis Global Holdco, LLC and its debtor affiliates, as debtors and debtors-in-possession in the above-captioned chapter 11 cases (collectively, the “Debtors”) filed the *Plan Supplement for the Debtors’ Amended Joint Chapter 11 Plan* (ECF No. 1117), which included the following materials: (a) the Schedule of Assumed Executory Contracts and Unexpired Leases; (b) the Members of the Litigation Oversight Committee and Wind-Down Oversight Committee; (c) the List of Intercompany Claims that Constitute Excluded Claims; (d) the Retained Causes of Action; (e) the Digital Assets Conversion Table; and (f) Justifications for Exculpated & Released Parties.<sup>2</sup>

<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s tax identification number (as applicable), are: Genesis Global Holdco, LLC (8219); Genesis Global Capital, LLC (8564); Genesis Asia Pacific PTE. LTD. (2164R). For the purpose of these Chapter 11 Cases, the service address for the Debtors is 175 Greenwich Street, Floor 38, New York, NY 10007.

<sup>2</sup> Capitalized terms used but not defined herein shall have the meanings ascribed to such terms in the *Debtors’ Amended Joint Chapter 11 Plan* (ECF No. 1712) (as may be amended, supplemented, or modified from time to time, the “Plan”) or the *Amended Disclosure Statement with Respect to the Amended Joint Plan of Genesis Global Holdco, LLC et al., Under Chapter 11 of the Bankruptcy Code* (ECF No. 1031) (the “Disclosure Statement”).

**PLEASE TAKE FURTHER NOTICE** that, on January 6, 2024, the Debtors filed the following additional exhibits to the Plan Supplement: (a) the identity of the PA Officer and (b) the candidates for the New Board.

**PLEASE TAKE FURTHER NOTICE** that, on January 8, 2024, the Debtors filed the following additional exhibits to the Plan Supplement: (a) the Plan Administration Agreement; (b) the Litigation Oversight Committee Bylaws; (c) the Wind-Down Oversight Committee Bylaws; and (d) the New Governance Documents.

**PLEASE TAKE FURTHER NOTICE** that, on January 9, 2024, the Debtors filed, as an additional exhibit to the Plan Supplement, the Setoff Principles for Allowance of Certain Claims.

**PLEASE TAKE FURTHER NOTICE** that, on February 23, 2024, the Debtors filed the following additional exhibits to the Plan Supplement: (a) the Revised Plan Administration Agreement, (b) a blackline of the Revised Plan Administration Agreement against the Plan Administration Agreement filed on January 8, 2024, (c) the Revised Litigation Oversight Committee Bylaws, (d) a blackline of the Revised Litigation Oversight Committee Bylaws against the Litigation Oversight Committee Bylaws filed on January 8, 2024, (e) the Revised Wind-Down Oversight Committee Bylaws, (f) a blackline of the Revised Wind-Down Oversight Committee Bylaws against the Wind-Down Oversight Committee Bylaws filed on January 8, 2024, (g) the Gemini Reserve Principles, and (h) the Gemini Lender Distribution Principles.

**PLEASE TAKE FURTHER NOTICE** that, on February 26, 2024, the Debtors filed, as an additional exhibit to the Plan Supplement, the form of Cooperation Agreement.

**PLEASE TAKE FURTHER NOTICE** that, on April 9, 2024, the Debtors filed the following additional exhibits to the Plan Supplement: (a) the Revised Plan Administration Agreement, (b) a blackline of the Revised Plan Administration Agreement against the Revised Plan Administration Agreement filed on February 23, 2024, and (c) the identity of the GAP Director.

**PLEASE TAKE FURTHER NOTICE** that, on May 6, 2024, the Debtors filed the following additional exhibits to the Plan Supplement: (a) an updated list of the Members of the Litigation Oversight Committee and Wind-Down Oversight Committee, (b) the Revised Plan Administration Agreement, (c) a changed pages blackline of the Revised Plan Administration Agreement against the Revised Plan Administration Agreement filed on April 9, 2024, (d) the Revised Litigation Oversight Committee Bylaws, (e) a changed pages blackline of the Revised Litigation Oversight Committee Bylaws against the Revised Litigation Oversight Committee Bylaws filed on February 23, 2024, (f) the Revised Wind-Down Oversight Committee Bylaws, and (g) a changed pages blackline of the Revised Wind-Down Oversight Committee Bylaws against the Revised Wind-Down Oversight Committee Bylaws filed on February 23, 2024.

**PLEASE TAKE FURTHER NOTICE** that, on May 29, 2024, the Debtors hereby file the following additional exhibit to the Plan Supplement regarding persons which may be employed by the PA Officer, the Wind-Down Oversight Committee or the Litigation Oversight Committee following the Plan Effective Date.

**PLEASE TAKE FURTHER NOTICE** that the Debtors expressly reserve the right, subject to the terms and conditions set forth in the Plan to alter, amend, modify, or supplement any document in the Plan Supplement and to file additional documents to be included in the Plan Supplement. Certain of the documents in the Plan Supplement remain subject to ongoing negotiations between the Debtors and other parties to those documents, and the Debtors and all such parties reserve their rights with regard to those documents. To the extent any document in the Plan Supplement is altered, amended, modified, or supplemented in any material respect, in accordance with the terms of the Plan, prior to the Confirmation Hearing (as defined below), the Debtors will file a blackline of such document with the Bankruptcy Court.

**PLEASE TAKE FURTHER NOTICE** that the forms of the documents contained in the Plan Supplement are integral to, and are considered part of, the Plan. If the Plan is approved, the documents in substantially the form contained in the Plan Supplement will be approved by the Bankruptcy Court pursuant to the order confirming the Plan.

**PLEASE TAKE FURTHER NOTICE** that copies of all pleadings filed in these chapter 11 cases can be viewed and/or obtained: (i) by visiting the Debtors' case website at <https://restructuring.ra.kroll.com/genesis/>, (ii) otherwise from the Debtors' notice and claims agent, Kroll Restructuring Administration LLC, located at 55 East 52nd Street, 17th Floor, New York, NY 10055, or by calling +1 888-524-2017 or (iii) accessing the Court's website at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov). Note that a PACER password is needed to access documents on the Court's website.

Dated: May 29, 2024  
New York, New York

/s/ Sean A. O'Neal  
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**PLAN SUPPLEMENT FOR THE  
DEBTORS’ AMENDED JOINT CHAPTER 11 PLAN**

**TABLE OF CONTENTS<sup>2</sup>**

**Exhibit AA:** Employees Following Plan Effective Date

*[Remainder of page intentionally left blank]*

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**EXHIBIT AA**

The Plan Administrator, the Litigation Oversight Committee, and/or the Wind Down Oversight Committee, may determine to employ or retain current employees, including officers, following the occurrence of the Plan Effective Date, and provide compensation at levels consistent with market practice in their discretion.